

Wildlife Restoration/Hunter Education Advisory Team



Advisory 2020-014: State Electronic Data System Eligible Costs

July 28, 2020

May WSFR funds be used to support costs for enhancing State electronic data systems to facilitate recruitment, retention, and reactivation of hunters and recreational shooters?

Definitions:

Data dashboard means, for the purposes of this guidance, an information management tool that focuses on the presentation of data collected or analyzed for the benefit of the State fish and wildlife agency and the public. They are customizable to meet the specific needs of an agency. A dashboard connects to files, attachments, services, or an application programming interface, and displays data in the form of tables, line charts, bar charts, or gauges. A data dashboard is an efficient way to communicate information from multiple data sources because it provides a central location for entities to monitor and analyze performance.

State Electronic Data System (SEDS) means, for the purposes of this guidance, an electronic system used by a State fish and wildlife agency to sell licenses, collect data, and communicate information. The functions and abilities of SEDSs may vary depending on the State fish and wildlife agency needs and organization. A SEDS may include components for financial transactions that a State fish and wildlife agency uses when interacting with customers, previously referred to as “automated licensing systems.” This definition is not intended to limit the scope of an electronic system that a State fish and wildlife agency may employ and may apply to multiple electronic systems if applicable to the management of a State fish and wildlife agency.

Discussion: The Service’s Wildlife & Sport Fish Restoration Program (WSFR) assigned a Team in 2018 to research SEDSs to determine what uses may be eligible using WSFR funds and if costs of the system could be itemized so that eligible and ineligible costs could be properly allocated. The Team met with a few major vendors and determined that SEDSs have a variety of uses and associated components or modules, and that SEDS vendors can assign costs specific to certain components/modules. States that maintain internal systems without using a vendor may also have this ability. Guidance was developed based on the ability of State fish and wildlife agencies to demonstrate and document costs that are allocable to their respective Federal grant. A cost is allocable to a Federal grant if the goods or services involved are chargeable and assignable to the Federal grant in accordance with the relative benefits received. Additional guidance is provided at 2 CFR 200.405.

The guidance was delayed allowing another review following the passage of the Target Practice and Marksmanship Training Support Act (P. Law 116-17) and the Modernizing the Pittman-Robertson Fund for the Needs of Tomorrow Act (P. Law 116-94). The WR/HE Advisory Team updated the draft guidance to accommodate the new laws and it will be distributed for further review and comment before publishing.

The conclusion of our assessment is that there are indeed SEDS costs that may be allocated to a grant and we will use some of the content of the draft guidance to respond to this inquiry.

Advisory: Yes, some costs of supporting a SEDS may be eligible to be charged to a grant if your activity is supported by the regulations or eligible activities under P. Laws [116-17](#) or [116-94](#) and either there is a distinct module in the SEDS to assist in implementing the objective of the grant, or a State agency is able to otherwise document eligible costs. Costs must be justified and properly allocated to the grant.

Costs associated with license sales, producing income, and law enforcement are ineligible. If any component of the SEDS contains a combination of eligible and ineligible activity costs and cannot be easily separated between eligible and ineligible costs, it is not allowable. If costs can be properly allocated, eligible costs may be considered.

Eligible and properly allocated costs may be considered eligible under an approved grant, potentially using funds from multiple funding sources under 16 U.S.C. 669. The funding sources and some examples are listed below. Activities in examples may be considered eligible using funding sources other than the one they are listed under, if they are justified to support grant objectives, are necessary and reasonable, and the activities are substantial in character and design.

1) 16 U.S.C. 669c(b) (Traditional Wildlife Restoration)

Examples:

- Certifying license holders to report to WSFR for determining annual apportionments.
- Collecting, assessing, and analyzing data associated with species and habitat surveys.
- Surveying the public regarding either specific issues that the State fish and wildlife agency wishes to address, or about more generalized topics of interest to the agency that inform wildlife restoration goals.
- Surveying the public about their attitudes toward hunting or recreational shooting, including human dimensions research.
- Registering harvest or catch, including collecting any type of information from a hunter on species, locations, experiences, etc.
- Land management planning.
- Collecting and/or storing geographical information, such as locations of Wildlife Management Areas or habitat treatments. These collections may also be associated with mobile device applications.
- Uploading incident reports for agencies to use in assessing program effectiveness, such as nuisance animal complaints, disease reporting, and technical assistance.

2) 16 U.S.C. 669c(c) (Basic Hunter Education or R3) for Basic Hunter Education activities

Examples:

- Registering students for hunter or shooter education.
- Issuing certificates to students who have completed courses.

- Importing data from education vendors, for example, when a hunter education vendor collects information and transmits it to the State fish and wildlife agency.
- Managing volunteers and documenting volunteer hours associated with an award.

3) 16 U.S.C. 669c(c) (Basic Hunter Education or R3) for R3 activities

Examples:

- Surveying lapsed hunters, provided the survey is not associated with encouraging the lapsed participant to purchase a license.
- Identifying individuals who successfully completed a hunter education program but did not eventually purchase a hunting license. This activity requires access to information from the ineligible license sales system but is not associated with the selling of the license, so it is allowable.
- Surveying hunters about their level of participation, experiences, costs of engaging in the activity, or other information that a State fish and wildlife agency collects from participants to assist the agency to understand trends and determine needs.
- Data dashboards that supply information to the public. Any component of the dashboard that is associated with license sales, permit fees, etc. is not eligible.

4) 16 U.S.C. 669h-1 (Enhanced Hunter Education/R3)

Examples:

- Managing data to identify potential locations for new public target ranges.
- Storing information on public target ranges to communicate locations and opportunities to the public.
- Data to assist in targeting public audiences for education on the conservation and responsible use of wildlife resources.
- Data dashboards to provide hunting and recreational shooting access information to the public.